

DOWNEY BRAND LLP  
 Jamie P. Dreher (Bar No. 209380)  
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 Sacramento, CA 95814  
 Telephone: (916) 444-1000  
 Facsimile: (916) 444-2100

Attorneys for  
 Teichert Pipelines, Inc. and A. Teichert & Sons, Inc.  
 d/b/a Teichert Aggregates

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC COMPANY,  
 Debtors.

Case Nos.:

19-30088 (DM) – Lead Case  
 19-30089 (DM)

Chapter 11 Case

**NOTICE OF CONTINUED  
 PERFECTION OF MECHANICS  
 LIEN PURSUANT TO 11 U.S.C. §  
 546(b)(2)**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affect both Debtors

TEICHERT PIPELINES, Inc. ("TEICHERT"), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 546(b)(2), as follows:

1. TEICHERT is a corporation that has provided and delivered labor, services, equipment, and/or materials for a work of improvement located in the County of Sacramento, State of California (the "Property") and owned by PG&E Corporation and/or

1 Pacific Gas and Electric Company (collectively, the "Debtors").

2 2. Through August 22, 2019, the amount owing to TEICHERT is at least  
3 \$1,123,321.57, exclusive of accruing interest and other charges, with additional amounts  
4 owed and accrued after August 22, 2019.

5 3. Teichert properly perfected its mechanics lien under California Civil Code §§  
6 8400, *et seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official Records  
7 of Sacramento County, State of California, as more fully described in its Mechanics Lien, a  
8 true copy of which is attached hereto as Exhibit A, on or about August 23, 2019.

9 4. Pursuant to California Civil Code § 8460, an action to enforce a lien must be  
10 commenced within 90 days after recordation of the claim of lien. However, due to the  
11 automatic stay set forth in 11 U.S.C. § 362, TEICHERT is precluded from filing a state court  
12 action to enforce its mechanics lien. 11 U.S.C. § 546(b)(2) provides that when applicable law  
13 requires seizure of property or commencement of an action to perfect, maintain, or continue  
14 the perfection of an interest in property, and the property has not been seized or an action has  
15 not been commenced before the bankruptcy petition date, then the claimant shall instead give  
16 notice within the time fixed by law for seizing the property or commencing an action. (See  
17 11 U.S.C. § 546(b)(2); see also *In re Baldwin Builders (Village Nurseries v. Gould)*, 232 B.R.  
18 406, 410-411 (9<sup>th</sup> Cir. 1999); *Village Nurseries v. Greenbaum*, 101 Cal.App.4<sup>th</sup> 26, 41 (Cal.  
19 Ct. App. 2002).)

20 5. Accordingly, TEICHERT hereby provides notice of its rights as a perfected  
21 lienholder in the Property pursuant to California's mechanics lien law. TEICHERT is filing  
22 and serving this notice to preserve, perfect, maintain, and continue the perfection of its lien  
23 and its rights in the Property to comply with the requirements of California state law, 11  
24 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice  
25 constitutes the legal equivalent of having commenced an action to foreclose the lien in the  
26 proper court. By this notice, the Debtors and other parties in interest are estopped from  
27 claiming that the lawsuit to enforce TEICHERT's mechanics lien was not timely commenced  
28 pursuant to applicable state law. TEICHERT intends to enforce its lien rights to the fullest

1 extent permitted by applicable law. The interests perfected, maintained, or continued by  
2 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of  
3 the Property.

4 6. The filing of this notice shall not be construed as an admission that such filing  
5 is required under the Bankruptcy Code, the California mechanics lien law, or any other  
6 applicable law. In addition, TEICHERT does not make any admission of fact or law, and  
7 TEICHERT asserts that its lien is senior to and effective against entities that may have  
8 acquired rights or interests in the Property previously.

9 7. The filing of this notice shall not be deemed to be a waiver of TEICHERT's  
10 right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of  
11 any other rights or defenses.

12 8. TEICHERT reserves all rights, including the right to amend or supplement  
13 this notice.

14  
15 DATED: August 26, 2019

DOWNEY BRAND LLP

17 By: /s/ Jamie P. Dreher  
18 JAMIE P. DREHER  
19 Attorney for  
20 TEICHERT PIPELINES, INC. AND  
21 A. TEICHERT & SONS, INC. D/B/A TEICHERT  
22 AGGREGATES  
23  
24  
25  
26  
27  
28

# Exhibit A

ORIGINAL  
Accepted for Recording  
COPY-NOT CERTIFIED

AUG 23 2019

Sacramento County  
Clerk-Recorder  
201908230731

RECORDING REQUESTED BY  
REQUESTED BY SCOTT MCELHERN  
WHEN RECORDED MAIL TO

NAME DOWNEY BRAND LLP  
MAILING Scott McElhern  
ADDRESS 621 Capitol Mall, 18th Floor  
Sacramento, CA 95814

PHONE (916) 444-1000  
NUMBER

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

**CLAIM OF MECHANICS LIEN**  
**(Cal. Civ. Code § 8416)**

1. Teichert Pipelines, Inc. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a Pacific Gas & Electric Company work of improvement located in the City of Sacramento, County of Sacramento, State of California, and more particularly described as follows:

Gas main lines and gas service lines for the locations listed on the attached Exhibit A; and

Deactivation of the following gas lines:

14th Avenue between 52nd Street and 58th Street in Sacramento, CA 95820;

57th Street between 14th Avenue and San Francisco Boulevard, Sacramento, CA 95820;

San Francisco Boulevard between 55th Street and 57th Street, Sacramento, CA 95820;

55th Street between San Francisco Boulevard and 19th Avenue, Sacramento, CA 95820;

19th Avenue between 52nd Street and 55th Street, Sacramento, CA 95820;

20th Avenue between Stockton Boulevard and 52nd Street & 53rd Street Alley, Sacramento, CA 95820;

52nd Street & 53rd Street Alley between 19th Avenue and 20th Avenue, Sacramento, CA 95820

2. After deducting all just credits and offsets, the sum of \$1,123,321.57, plus interest accrued and accruing thereon at the maximum legal rate, is due Claimant for the following generally described labor, materials, services, and/or equipment: construction and installation of 1-1/4 inch, 2-inch, 4-inch, and 6-inch high pressure plastic gas main; gas service uprates; gas service replacements; gas transfer services; deactivation of low pressure wrought iron gas main; and deactivation of low pressure plastic gas main.

3. Claimant furnished the work and materials at the request of and under contract with Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

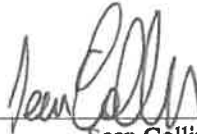
4. The name and address of the owner or reputed owner of the improvements is Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105. Claimant asserts this lien on the distinct and

vested property rights of Pacific Gas & Electric Company in the improvements, and not on the interest of any private or public fee owners.

5. Claimant's address is: 3500 American River Drive, Sacramento, CA 95864.

DATED: August 22, 2019

TEICHERT PIPELINES, INC.

By:   
Sean Collins, Credit Manager

## VERIFICATION

I, Sean Collins, am the Credit Manager of Teichert Pipelines, Inc., and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: August 22, 2019

TEICHERT PIPELINES, INC.

By: 

Sean Collins, Credit Manager

## EXHIBIT A

4965 9th Avenue, Sacramento, CA 95820	5024 10th Avenue, Sacramento, CA 95820
5001 9th Avenue, Sacramento, CA 95820	5032 10th Avenue, Sacramento, CA 95820
5009 9th Avenue, Sacramento, CA 95820	5040 10th Avenue, Sacramento, CA 95820
5017 9th Avenue, Sacramento, CA 95820	5048 10th Avenue, Sacramento, CA 95820
5025 9th Avenue, Sacramento, CA 95820	5056 10th Avenue, Sacramento, CA 95820
5033 9th Avenue, Sacramento, CA 95820	5068 10th Avenue, Sacramento, CA 95820
5041 9th Avenue, Sacramento, CA 95820	5081 10th Avenue, Sacramento, CA 95820
5049 9th Avenue, Sacramento, CA 95820	4917 11th Avenue, Sacramento, CA 95820
5057 9th Avenue, Sacramento, CA 95820	4925 11th Avenue, Sacramento, CA 95820
5065 9th Avenue, Sacramento, CA 95820	4933 11th Avenue, Sacramento, CA 95820
5073 9th Avenue, Sacramento, CA 95820	4941 11th Avenue, Sacramento, CA 95820
5109 9th Avenue, Sacramento, CA 95820	4951 11th Avenue, Sacramento, CA 95820
5115 9th Avenue, Sacramento, CA 95820	5009 11th Avenue, Sacramento, CA 95820
5000 9th Avenue, Sacramento, CA 95820	5017 11th Avenue, Sacramento, CA 95820
5008 9th Avenue, Sacramento, CA 95820	5025 11th Avenue, Sacramento, CA 95820
5016 9th Avenue, Sacramento, CA 95820	5033 11th Avenue, Sacramento, CA 95820
5024 9th Avenue, Sacramento, CA 95820	5041 11th Avenue, Sacramento, CA 95820
5032 9th Avenue, Sacramento, CA 95820	5049 11th Avenue, Sacramento, CA 95820
5040 9th Avenue, Sacramento, CA 95820	5057 11th Avenue, Sacramento, CA 95820
5048 9th Avenue, Sacramento, CA 95820	5065 11th Avenue, Sacramento, CA 95820
5056 9th Avenue, Sacramento, CA 95820	5073 11th Avenue, Sacramento, CA 95820
5064 9th Avenue, Sacramento, CA 95820	5107 11th Avenue, Sacramento, CA 95820
5072 9th Avenue, Sacramento, CA 95820	5115 11th Avenue, Sacramento, CA 95820
5100 9th Avenue, Sacramento, CA 95820	4916 11th Avenue, Sacramento, CA 95820
5118 9th Avenue, Sacramento, CA 95820	4926 11th Avenue, Sacramento, CA 95820
3410 50th Street, Sacramento, CA 95820	4932 11th Avenue, Sacramento, CA 95820
3405 50th Street, Sacramento, CA 95820	4942 11th Avenue, Sacramento, CA 95820
3424 50th Street, Sacramento, CA 95820	4948 11th Avenue, Sacramento, CA 95820
3425 50th Street, Sacramento, CA 95820	4956 11th Avenue, Sacramento, CA 95820
3524 50th Street, Sacramento, CA 95820	3604 50th Street, Sacramento, CA 95820
3525 50th Street, Sacramento, CA 95820	5000 11th Avenue, Sacramento, CA 95820
5001 10th Avenue, Sacramento, CA 95820	5008 11th Avenue, Sacramento, CA 95820
5009 10th Avenue, Sacramento, CA 95820	5016 11th Avenue, Sacramento, CA 95820
5017 10th Avenue, Sacramento, CA 95820	5024 11th Avenue, Sacramento, CA 95820
5025 10th Avenue, Sacramento, CA 95820	5032 11th Avenue, Sacramento, CA 95820
5033 10th Avenue, Sacramento, CA 95820	5040 11th Avenue, Sacramento, CA 95820
5041 10th Avenue, Sacramento, CA 95820	5048 11th Avenue, Sacramento, CA 95820
5049 10th Avenue, Sacramento, CA 95820	5056 11th Avenue, Sacramento, CA 95820
5057 10th Avenue, Sacramento, CA 95820	5064 11th Avenue, Sacramento, CA 95820
5065 10th Avenue, Sacramento, CA 95820	5106 11th Avenue, Sacramento, CA 95820
5073 10th Avenue, Sacramento, CA 95820	3601 50th Street, Sacramento, CA 95820
5000 10th Avenue, Sacramento, CA 95820	4917 12th Avenue, Sacramento, CA 95820
5008 10th Avenue, Sacramento, CA 95820	4925 12th Avenue, Sacramento, CA 95820
5016 10th Avenue, Sacramento, CA 95820	4933 12th Avenue, Sacramento, CA 95820



4941 12th Avenue, Sacramento, CA 95820	4948 13th Avenue, Sacramento, CA 95820
4949 12th Avenue, Sacramento, CA 95820	4956 13th Avenue, Sacramento, CA 95820
4957 12th Avenue, Sacramento, CA 95820	4964 13th Avenue, Sacramento, CA 95820
5001 12th Avenue, Sacramento, CA 95820	5000 13th Avenue, Sacramento, CA 95820
5009 12th Avenue, Sacramento, CA 95820	5008 13th Avenue, Sacramento, CA 95820
5017 12th Avenue, Sacramento, CA 95820	5016 13th Avenue, Sacramento, CA 95820
5025 12th Avenue, Sacramento, CA 95820	5024 13th Avenue, Sacramento, CA 95820
5033 12th Avenue, Sacramento, CA 95820	5032 13th Avenue, Sacramento, CA 95820
5041 12th Avenue, Sacramento, CA 95820	5040 13th Avenue, Sacramento, CA 95820
5049 12th Avenue, Sacramento, CA 95820	5048 13th Avenue, Sacramento, CA 95820
5057 12th Avenue, Sacramento, CA 95820	5054 13th Avenue, Sacramento, CA 95820
5065 12th Avenue, Sacramento, CA 95820	5064 13th Avenue, Sacramento, CA 95820
5073 12th Avenue, Sacramento, CA 95820	5072 13th Avenue, Sacramento, CA 95820
4926 12th Avenue, Sacramento, CA 95820	4957 13th Avenue, Sacramento, CA 95820
4932 12th Avenue, Sacramento, CA 95820	5001 13th Avenue, Sacramento, CA 95820
4942 12th Avenue, Sacramento, CA 95820	3722 50th Street, Sacramento, CA 95820
4948 12th Avenue, Sacramento, CA 95820	4821 11th Avenue, Sacramento, CA 95820
5000 12th Avenue, Sacramento, CA 95820	4825 11th Avenue, Sacramento, CA 95820
5008 12th Avenue, Sacramento, CA 95820	4833 11th Avenue, Sacramento, CA 95820
5016 12th Avenue, Sacramento, CA 95820	4847 11th Avenue, Sacramento, CA 95820
5024 12th Avenue, Sacramento, CA 95820	4849 11th Avenue, Sacramento, CA 95820
5032 12th Avenue, Sacramento, CA 95820	4857 11th Avenue, Sacramento, CA 95820
5040 12th Avenue, Sacramento, CA 95820	4873 11th Avenue, Sacramento, CA 95820
5048 12th Avenue, Sacramento, CA 95820	4878 11th Avenue, Sacramento, CA 95820
5056 12th Avenue, Sacramento, CA 95820	4901 11th Avenue, Sacramento, CA 95820
5066 12th Avenue, Sacramento, CA 95820	4826 11th Avenue, Sacramento, CA 95820
5072 12th Avenue, Sacramento, CA 95820	4836 11th Avenue, Sacramento, CA 95820
5074 12th Avenue, Sacramento, CA 95820	4840 11th Avenue, Sacramento, CA 95820
4923 13th Avenue, Sacramento, CA 95820	4850 11th Avenue, Sacramento, CA 95820
4925 13th Avenue, Sacramento, CA 95820	4856 11th Avenue, Sacramento, CA 95820
4933 13th Avenue, Sacramento, CA 95820	4864 11th Avenue, Sacramento, CA 95820
4941 13th Avenue, Sacramento, CA 95820	4900 11th Avenue, Sacramento, CA 95820
4949 13th Avenue, Sacramento, CA 95820	4910 11th Avenue, Sacramento, CA 95820
5009 13th Avenue, Sacramento, CA 95820	3649 Stockton Boulevard, Sacramento, CA 95820
5017 13th Avenue, Sacramento, CA 95820	4825 12th Avenue, Sacramento, CA 95820
5025 13th Avenue, Sacramento, CA 95820	4835 12th Avenue, Sacramento, CA 95820
5033 13th Avenue, Sacramento, CA 95820	4841 12th Avenue, Sacramento, CA 95820
5041 13th Avenue, Sacramento, CA 95820	4849 12th Avenue, Sacramento, CA 95820
5063 13th Avenue, Sacramento, CA 95820	4901 12th Avenue, Sacramento, CA 95820
5065 13th Avenue, Sacramento, CA 95820	4909 12th Avenue, Sacramento, CA 95820
5067 13th Avenue, Sacramento, CA 95820	3701 Stockton Boulevard, Sacramento, CA 95820
5069 13th Avenue, Sacramento, CA 95820	4824 12th Avenue, Sacramento, CA 95820
4916 13th Avenue, Sacramento, CA 95820	4832 12th Avenue, Sacramento, CA 95820
4924 13th Avenue, Sacramento, CA 95820	4844 12th Avenue, Sacramento, CA 95820
4932 13th Avenue, Sacramento, CA 95820	4900 12th Avenue, Sacramento, CA 95820
4940 13th Avenue, Sacramento, CA 95820	4912 12th Avenue, Sacramento, CA 95820

3711 Stockton Blvd, Sacramento, CA 95820  
4900 13th Avenue, Sacramento, CA 95820  
4908 13th Avenue, Sacramento, CA 95820  
4907 13th Avenue, Sacramento, CA 95820  
4909 13th Avenue, Sacramento, CA 95820  
3717 Stockton Boulevard, Sacramento, CA 95820  
3731 Stockton Boulevard, Sacramento, CA 95820  
3733 Stockton Boulevard, Sacramento, CA 95820  
3749 Stockton Boulevard, Sacramento, CA 95820  
3741 Stockton Boulevard, Sacramento, CA 95820  
4903 13th Avenue, Sacramento, CA 95820  
4905 13th Avenue, Sacramento, CA 95820  
5123 9th Avenue, Sacramento, CA 95820  
5132 9th Avenue, Sacramento, CA 95820  
5134 9th Avenue, Sacramento, CA 95820  
5131 9th Avenue, Sacramento, CA 95820  
3420 52nd Street, Sacramento, CA 95820  
3420 1/2 52nd Street, Sacramento, CA 95820  
3424 52nd Street, Sacramento, CA 95820  
3426 52nd Street, Sacramento, CA 95820  
3428 52nd Street, Sacramento, CA 95820  
3432 52nd Street, Sacramento, CA 95820  
3500 52nd Street, Sacramento, CA 95820  
3510 52nd Street, Sacramento, CA 95820  
3516-A 52nd Street, Sacramento, CA 95820  
3516-B 52nd Street, Sacramento, CA 95820  
3516-C 52nd Street, Sacramento, CA 95820  
3526 52nd Street, Sacramento, CA 95820  
3530 52nd Street, Sacramento, CA 95820  
3417 52nd Street, Sacramento, CA 95820  
3417 1/2 52nd Street, Sacramento, CA 95820  
3425 52nd Street, Sacramento, CA 95820  
3425 1/2 52nd Street, Sacramento, CA 95820  
3433 52nd Street, Sacramento, CA 95820  
3501 52nd Street, Sacramento, CA 95820  
3509 52nd Street, Sacramento, CA 95820  
3515 52nd Street, Sacramento, CA 95820  
3525 52nd Street, Sacramento, CA 95820  
5131 11th Avenue, Sacramento, CA 95820  
5123 11th Avenue, Sacramento, CA 95820  
5124 11th Avenue, Sacramento, CA 95820

5136 11th Avenue, Sacramento, CA 95820  
3608 52nd Street, Sacramento, CA 95820  
3608 1/2 52nd Street, Sacramento, CA 95820  
3616 52nd Street, Sacramento, CA 95820  
3617 52nd Street, Sacramento, CA 95820  
3625 52nd Street, Sacramento, CA 95820  
3635 52nd Street, Sacramento, CA 95820  
3641 52nd Street, Sacramento, CA 95820  
3649 52nd Street, Sacramento, CA 95820  
3701 52nd Street, Sacramento, CA 95820  
3709 52nd Street, Sacramento, CA 95820  
3624 52nd Street, Sacramento, CA 95820  
3632 52nd Street, Sacramento, CA 95820  
3640 52nd Street, Sacramento, CA 95820  
3654 52nd Street, Sacramento, CA 95820  
3700 52nd Street, Sacramento, CA 95820  
3702 52nd Street, Sacramento, CA 95820  
3533 52nd Street, Sacramento, CA 95820  
3541 52nd Street, Sacramento, CA 95820  
5201 11th Avenue, Sacramento, CA 95820  
3601 52nd Street, Sacramento, CA 95820  
3611 52nd Street, Sacramento, CA 95820  
3720 52nd Street, Sacramento, CA 95820  
3736 52nd Street, Sacramento, CA 95820  
3738 52nd Street, Sacramento, CA 95820  
3804 52nd Street, Sacramento, CA 95820  
5139 14th Avenue, Sacramento, CA 95820  
3717 52nd Street, Sacramento, CA 95820  
3725 52nd Street, Sacramento, CA 95820  
3733 52nd Street, Sacramento, CA 95820  
3741 52nd Street, Sacramento, CA 95820  
3801 52nd Street, Sacramento, CA 95820  
5500 55th Street, Sacramento, CA 95820  
5504 55th Street, Sacramento, CA 95820  
4115 55th Street, Sacramento, CA 95820

## **NOTICE OF MECHANICS LIEN CLAIM**

### **ATTENTION!**

**Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.**

**The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.**

**BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT [www.clb.ca.gov](http://www.clb.ca.gov).**

**PROOF OF SERVICE AFFIDAVIT**

I, Mary Dowd declare:

On August 23, 2019, at Sacramento, California, I served the enclosed:

**CLAIM OF MECHANIC'S LIEN**

by enclosing true and correct copies thereof in sealed envelopes, with postage thereon fully prepaid, using one of the following described mailing methods:

- ☐ Registered Mail, Return Receipt Requested;
- ☒ Certified Mail, Return Receipt Requested;
- ☐ Express Mail; or
- ☐ Overnight delivery by an express service carrier.

The envelope was addressed as follows:

Pacific Gas & Electric Company  
77 Beale Street, 32nd Floor  
San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed on August 23, 2019, at Sacramento, California.

  
\_\_\_\_\_  
Mary Dowd